IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Patent Application

Inventor(s):	Yoad Gidron et al.	**Serial No.:**	10/573,832
Case:	Mobilitec 5	**Filed:**	12/05/2006
Examiner:	Choo, Munsoon	**Group Art Unit:**	2617
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Title: SERVICE PLATFORM FOR CELLULAR TELEPHONY

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APPEAL BRIEF

Appellants submit this Appeal Brief to the Board of Patent Appeals and Interferences on appeal from the decision of the Examiner of Group Art Unit 2617 mailed June 29, 2009 rejecting claims 36-68.

In the event that an extension of time is required for this appeal brief to be considered timely, and a petition therefor does not otherwise accompany this appeal brief, any necessary extension of time is hereby petitioned for.

The **$540** Appeal Brief fee is being paid with the EFS Web submission of this Appeal Brief. Appellants do not believe that any other fees are due. In the event Appellants are incorrect, the Commissioner is authorized to charge any other fees to Deposit Account No. 50-4802/**ALU/MOBILITEC5**.

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Real Party in Interest

The real party in interest is Alcatel Lucent, a publicly held company organized under the laws of France.

Related Appeals and Interferences

Appellants assert that no appeals or interferences are known to Appellants, Appellants' legal representative, or assignee which will directly affect or be directly affected by or have a bearing on the Board's decision in the pending appeal.

Status of Claims

Claims 36-68 are pending in the application. Claims 1-33 were originally presented in the application. Claims 34-68 were added by amendment. Claims 1-35 have been cancelled. Claim 36 has been amended. The rejection of claims 36-68 is appealed.

Status of Amendments

All claim amendments have been entered.

Summary of Claimed Subject Matter

Embodiments of the present invention are generally directed to apparatus and methods for providing a platform for the provision of services over a cellular telephone network. The apparatus comprises an infrastructure for supporting a generic definition of a cellular service. The generic definition incorporates common features of different services and is able to take specific service-defining parameters, wherein the infrastructure facilitates the delivery of multiple content types to different devices using different protocols. The apparatus further comprises an external parameter setting mechanism for inputting respective service defining parameters to the generic definition, to thereby implement a desired service through said generic definition. The generic definition includes consideration of resource constraints of the different devices. The method comprises providing a generic definition of a cellular service, the generic definition incorporating common features of different services, and the generic definition is able to

take specific service-defining parameters wherein the cellular telephone network facilitates the delivery of multiple content types to different devices using different protocols, and for each one of a plurality of desired services, inputting respective service defining parameters to the generic definition, to thereby implement a desired service through the generic definition wherein the generic definition includes consideration of resource constraints of the different devices.

For the convenience of the Board of Patent Appeals and Interferences, Appellants' independent claims 36, 45, 51 and 62 are presented below with citations to various figures and appropriate citations to at least one portion of the specification for elements of the appealed claims.

Claim 36 recites (with references to illustrative portions of the specification added):

> 36. (Previously Presented) Apparatus providing a platform for the provision of services over a cellular telephone network, the apparatus comprising: (FIG. 1, 10)
>
> an infrastructure for supporting a generic definition of a cellular service, said generic definition incorporating common features of different services, said generic definition being able to take specific service-defining parameters, wherein the infrastructure facilitates the delivery of multiple content types to different devices using different protocols; and
>
> (FIG. 2, Pg. 4:1-32; Pg. 9:11-Pg. 11:3; Pg. 12:23-29; Pg. 13:20-25)
>
> an external parameter setting mechanism for inputting respective service defining parameters to said generic definition, thereby to implement a desired service through said generic definition, said generic definition includes consideration of resource constraints of the different devices. (Pg. 2:16-18; Pg. 4:23-27; Pg. 3:19-29).

Claim 45 recites (with references to illustrative portions of the specification added):

> 45. (Previously Presented) A method for the provision of services over a cellular telephone network comprising:

providing a generic definition of a cellular service, said generic definition incorporating common features of different services, and said generic definition being able to take specific service-defining parameters wherein the cellular telephone network facilitates the delivery of multiple content types to different devices using different protocols, and (FIG. 2, Pg. 4:1-32; Pg. 9:11-Pg. 11:3; Pg. 12:23-29; Pg. 13:20-25)

for each one of a plurality of desired services, inputting respective service defining parameters to said generic definition, thereby to implement a desired service through said generic definition wherein said generic definition includes consideration of resource constraints of the different devices. (Pg. 4:5-27).

Claim 51 recites (with references to illustrative portions of the specification added):

51. (Previously Presented) A method for managing a content delivery interface between a content provider and a subscriber wireless communication device, the method comprising:

providing a plurality of modules for the content delivery interface, each module for providing content as part of a different service wherein delivery of multiple content types to different devices using different protocols is facilitated; (Pg. 4:31-32)

providing a generic definition of said service, said generic definition incorporating common features of different services; selecting an appropriate one of said modules for the content delivery interface according to a currently desired service and said generic definition wherein said generic definition includes consideration of resource constraints of the different devices; and (FIG. 2, Pg. 4:1-32; Pg. 9:11-Pg. 11:3; Pg. 12:23-29; Pg. 13:20-25)

adding said appropriate module to the content delivery interface, thereby to provide said currently desired service from a platform that supports a plurality of services. (Pg. 4:6-24).

Claim 62 recites (with references to illustrative portions of the specification added):

62. (Previously Presented) A service delivery platform for an interface between a content provider and a wireless communication device, comprising: (FIG. 6, Pg. 19:20-Pg. 20:21)

a plurality of services for being provided to the wireless communication device by the content provider; (FIG. 7, 112, 114; Pg. 20:9)

an infrastructure for supporting a generic definition of a cellular service, said generic definition incorporating common features of different services; (FIG. 2, Pg. 9:29-31; Pg. 4:1-32)

a service controller for receiving a request for a service from the wireless communication device and for activating said service according to a service logic and said generic definition, wherein said service logic comprises at least one rule for determining at least one of whether and how said service is to be provided; and (FIG. 7, 110; Pg. 20:7-8; Pg. 6:20-23)

a service framework, configured to enable ones of said services to be added, removed or changed. (FIG. 6; Pg. 6:24-25).

GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

I. Claims 36, 38-45, 47-53, 58, 61-62, 64-68 are rejected under 35 U.S.C. §102(a) as being anticipated by Tammy.

II. Claims 37 and 46 are rejected under 35 U.S.C. §103(a) as being unpatentable over Tammy as applied to claims 36 and 45 above, and further in view of Wenocur et al. (Pub#2003/0041110, hereinafter Wenocur).

Claims 54-57 are rejected under 35 U.S.C. §103(a) as being unpatentable over Tammy as applied to claims 52 and 53 above, and further in view of Forstadius (Pub#2004/0110462, hereinafter Forstadius).

Claims 59 and 63 are rejected under 35 U.S.C. §103(a) as being unpatentable over Tammy as applied to claims 58 and 62 above, and further in view of Montemer (Pub#2004/0023644, hereinafter Montemer).

Claim 60 is rejected under 35 U.S.C. 103(a) as being unpatentable over Tammy as applied to claim 58 above, and further in view of Croome (Pub#2005/0101309, hereinafter Croome).

ARGUMENTS

I. Rejection under 35 U.S.C. §102.

Claims 36, 38-45, 47-53, 58, 61-62, 64-68 are rejected under 35 U.S.C. §102(a) as being anticipated by Wheat, Tammy (Pub# WO 03/067851, hereinafter Tammy).

A.1. Rejection of claim 36.

Claim 36 is rejected under 35 U.S.C. §102(a) as being anticipated by Tammy. The rejection is traversed. Appellants urge to the contrary.

1. The Examiner failed to establish a prima facie showing of anticipation because Tammy fails to teach exactly what is claimed.

According to MPEP §2131.03 (III) "Anticipation under §102 can be found only when the reference discloses exactly what is claimed and that where there are differences between the reference disclosure and the claim, the rejection must be based on §103 which takes differences into account. Furthermore, in order to anticipate the claims, the claimed subject matter must be disclosed in the reference with "sufficient specificity to constitute an anticipation under the statute." See MPEP §2131.03 (II).

The Tammy reference fails to teach or suggest each and every element of independent claim 36 as required under 35 U.S.C. §102. Therefore, the Examiner fails to establish a prima facie showing of anticipation. Appellants respectfully submit that a condition precedent to establishing a *prima facie* case of anticipation is the requirement that the reference discloses exactly what is claimed. See MPEP §2131.03 (III). Specifically, Tammy fails to teach or suggest at least: "an infrastructure for supporting a generic definition of a cellular service, said generic definition incorporating common features of different services, said generic definition being able to take specific service-defining parameters" and "an external parameter setting mechanism for inputting respective service defining parameters to said generic definition, thereby to implement a desired service through said generic definition," as recited in Appellants' independent claim 36.

In an effort to support the rejection, the Examiner juxtaposes in bold the passage believed to disclose the claimed feature "an infrastructure for supporting a generic definition of a cellular service, said generic definition incorporating common features of

different services." The remarks are reproduced here for ease of reference. "Abstract, the figure shows an infrastructure providing services to mobile station and the network through the exchange point B2B engine. The B2B engine (generic definition) incorporates services such as finding a restaurant for a mobile device user, and passing real-time information between the restaurant and the mobile user." (See Office Action paragraph 3, pp. 2-3).

2. *Broad Interpretation Inaccurate: The patent disclosure serves to point toward the proper meanings of claim terms.*

The MPEP makes clear that the intrinsic record (e.g., the specification) must be consulted to identify which of the different possible definitions is most consistent with the invention's use of the terms. See MPEP §2111.01 (III) quoting *Brookhill-Wilk* 1, 334 F.3d at 1300, 67 USPQ2d at 113 ("Where there are several common meanings for a claim term, the patent disclosure serves to point away from the improper meanings and toward the proper meanings.")

The Examiner parenthetically likens the B2B engine to the claimed feature "generic definition." Appellants respectfully disagree. On page 2 at line 19 of Appellants' specification generic definition is disclosed as comprising at least some of the following features of a service: availability, discoverability, findability, byuability and obtainability whereas on page 7, starting at line 26, Tammy discloses a business-to-business (B2B) engine 210 as including a number of applications modules and uses an operating system/middleware 222. Tammy is silent about "generic definition" because Tammy's objective lies elsewhere, e.g., finding a nearby fixed station such as a restaurant. (See Abstract). There is no correlation between the claimed feature "generic definition" and Tammy's B2B engine as alleged by the Examiner. Furthermore, on page 3 at line 9 of Appellants' specification generic definition is also disclosed as comprising an ability to select between one of a plurality of levels of complexity of content presentation according to a determined capacity level of a receiving telephone.

Next, the Examiner alleges that Tammy's data structure is being mapped in the B2B engine. Therefore, the B2B engine is able to take the parameters specified in the data structure. Since the data structure maps a service class to one or more parameters,

then the parameters are in fact service-defining parameters. (See Office Action, page 3). The Examiner cites the above Tammy's passage as teaching the claimed feature "said generic definition being able to take specific service defining parameters." However, on page 3, at lines 16-19, the specification discloses service defining parameters as logical rules. Accordingly, Tammy fails to teach or suggest at least the "said generic definition being able to take specific service defining parameters."

Further, On page 3 of the Office Action, the Examiner maps the claimed limitation "an external parameter setting mechanism" to Tammy's Fig. 19 on page 34. The Examiner commented: "Reservation application (external) for inputting reservation (service) for restaurant, doctor, dentist, theater." This assertion is unfortunately hopelessly deficient. The Examiner is looking for an anchor to rely on as teaching the claimed feature "an external parameter setting mechanism for inputting respective service defining parameters to said generic definition." On page 3, at lines 22-24, the specification discloses the parameter to be a location and the parameter setting mechanism to be the platform itself, e.g., the mobile telephone. As such, for at least these reasons, independent claim 36 is not anticipated by Tammy and is patentable under 35 U.S.C. §102(a).

3. All words in a claim must be considered.

Appellants could not discern any reference that fairly suggests the above recitation. As articulated above, Tammy is completely silent with respect to such a feature. In order for the Examiner to arrive at such conclusion, apparently the phrase "generic definition, incorporating common features of different services" was not accorded any patentable weight within the context of the claims. All words in a claim must be considered in judging the patentability of that claim against the prior art. (See MPEP §2143.03). One cannot divine claim meaning in a vacuum. Philips v. AWH Corporation (Fed. Cir. July 12, 2005). Further, as articulated above, the present application claims "said generic definition incorporating common features of different services," which is neither taught nor fairly suggested by Tammy. Even if Tammy did teach generic definition, it does not teach the claimed feature "incorporating common features of different services." The present application discloses a platform, which comprises a plurality of modules, each module

carrying the generic definition together with a different arrangement of parameters to thereby combine different services within said platform. (See specification page 3, lines 25-29). Stated differently, as all of the services are provided as separate entities on separate servers, the present application claims features that allow different services to work together to complement each other. (See specification page 2, lines 11-15). Tammy and the novel features of the present application are worlds apart.

The Examiner acknowledges that Tammy discloses finding a restaurant and passing real-time information between the restaurant and the mobile user whereas the present application claims in part incorporating common features of different services. Tammy further discloses a reservation management company i.e., a service provider, interconnected with the B2B engine, may provide a reservation application to member restaurants and a restaurant module for integration with the B2B engine." (See Abstract). This is further evidence that Tammy's concern lies elsewhere.

4. *Conclusion.*

Appellants respectfully submit that there is no suggestion in Tammy that would have resulted in Appellants' invention as provided in independent claim 36. Accordingly, independent claim 36 is not anticipated by Tammy and is allowable under 35 U.S.C. §102.

A.2. Claims 45, 51and 62.

Claims 45, 51 and 62 are rejected under 35 U.S.C. §102(a) as being anticipated by Tammy. Appellants urge to the contrary.

As articulated above with respect to claim 36, Tammy fails to teach exactly all elements of independent claims 45, 51 and 62 as required under 35 U.S.C. §102 for establishing a *prima facie* showing of anticipation. Independent claims 45, 51 and 62 recite at least some of the elements of independent claim 45, 51 and 62 that are discussed above. Therefore, for at least the reasons discussed above, independent claims 45, 51 and 62 also are patentable under 35 U.S.C. §102(a) over Tammy. Set forth below are additional reasons why Tammy does not anticipate the embodiments of independent claims 45, 51 and 62.

1. Test of inherency not satisfied.

On page 13 of the Office Action, the Examiner made reference to Tammy's Abstract for disclosing the claimed feature: "a service controller for receiving a request for a service from the wireless communication device." Then, the Examiner parenthetically commented: "A subscriber send a request to B2B engine to find a nearby restaurant, therefore, service controller is inherently disclosed in order to process the subscriber's request." However, it is respectfully submitted that before a reference can be found to disclose a feature by virtue of inherency, one of ordinary skill in the art viewing the reference must understand that the unmentioned feature at issue is *necessarily* present in the reference. *Continental Can Co. USA v. Monsanto Co.,* 948 F.2d 1264, 1268, 20 USPQ2d 1746, 1749 (Fed. Cir. 1991) The test of inherency is not satisfied by what a reference "may" teach. *Id.* ("Inherency... may not be established by probabilities or possibilities. The mere fact that a certain thing *may* result from a given set of circumstances is not sufficient".) More importantly, the Examiner's approach to claim construction is improper.

2. Improper claim construction.

Regarding claim 62, the Examiner improperly breaks the claim element into several parts. For example, the Examiner breaks the claimed limitation: "a service controller for receiving a request for a service from the wireless communication device and for activating said service according to a service logic and said generic definition" into two parts, namely, "a service controller for receiving a request for a service from the wireless communication device" and "and for activating said service according to a service logic and said generic definition." The Examiner gives no weight or meaning to the conjunction "and" that links the phrase "a service controller for receiving a request for a service from the wireless communication device" to the phrase for activating said service according to a service logic and said generic definition" to form thereby the claim element "a service controller for receiving a request for a service from the wireless communication device and for activating said service according to a service logic and said generic definition." (emphasis added). With respect to the instant claims, the context and proper interpretation of the initial claim term is simply lost using this analysis

technique. Taken to an extreme, a claim term may be broken into individual letters, which letters are likely present in any reference. The presence of the individual letters in a reference does not mean that the initial claim term has been disclosed or suggested.

3. Conclusion.

Appellants respectfully submit that there is no suggestion in Tammy that would have resulted in Appellants' invention as provided in independent claims 45, 51 and 62. Accordingly, independent claims 45, 51 and 62 are not anticipated by Tammy and is allowable under 35 U.S.C. §102.

II. Rejection under 35 U.S.C. §103.

A.1. Claims 37, 46, 59 and 63.

Claims 37, 46, 59 and 63 are rejected under 35 U.S.C. §103(a) as being unpatentable over Tammy as applied to claims 36 and 45 above, and further in view of Wenocur et al. Claims 59 and 63 are rejected under 35 U.S.C. §103(a) as being unpatentable over Tammy as applied to claims 58 and 62 above, and further in view of Montemer. Appellants urge to the contrary.

This ground of rejection applies only to dependent claims, and is predicated on the validity of the rejection under 35 U.S.C. §102 given Tammy as applied to independent claims 36, 45 and 61 above.

As articulated above with respect to claims 36, 45 and 61, there are missing claimed features not taught/suggested by the cited references – including "an infrastructure for supporting a generic definition of a cellular service, said generic definition incorporating common features of different services, said generic definition being able to take specific service-defining parameters." (emphasis added). – and thus, dependent claims 37, 46, 59 and 63 have been erroneously rejected under 35 U.S.C. §103(a). The Examiner failed to establish a *prima facie* showing of obviousness.

Therefore, Appellants' claims 37, 46, 59 and 63 are patentable under 35 U.S.C. §103(a) over Tammy in view of Wenocur et al and in the case of claims 59 and 63 in view of Montemer.

A.2. Claims 54-57 and 60.

Claims 54-57 are rejected under 35 U.S.C. §103(a) as being unpatentable over Tammy as applied to claims 52 and 53 above, and further in view of Forstadius. Claim 60 is rejected under 35 U.S.C. 103(a) as being unpatentable over Tammy as applied to claim 58 above, and further in view of Croome. Appellants urge to the contrary.

This ground of rejection applies only to dependent claims, and is predicated on the validity of the rejection under 35 U.S.C. §102 given Tammy as applied to independent claim 51 above.

As articulated above with respect to claim 51, there are missing claimed features not taught/suggested by the cited references – including "providing a generic definition of said service, said generic definition incorporating common features of different services; selecting an appropriate one of said modules for the content delivery interface according to a currently desired service and said generic definition wherein said generic definition includes consideration of resource constraints of the different devices." (emphasis added). – and thus, dependent claims 54-57 and 60 have been erroneously rejected under 35 U.S.C. §103(a). The Examiner failed to establish a *prima facie* showing of obviousness.

Therefore, Appellants' claims 54-57 and 60 are patentable under 35 U.S.C. §103(a) over Tammy in view of Forstadius and in the case of claim 60 in view of Croome.

Conclusion

Thus, Appellants submit that all of the claims presently in the application are allowable.

For the reasons advanced above, Appellants respectfully urge that the rejection of claims 36-68 is improper. Reversal of the rejection of the Office Action is respectfully requested.

Respectfully submitted,

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CLAIMS APPENDIX

1-35. (Cancelled).

36. (Previously Presented) Apparatus providing a platform for the provision of services over a cellular telephone network, the apparatus comprising

an infrastructure for supporting a generic definition of a cellular service, said generic definition incorporating common features of different services, said generic definition being able to take specific service-defining parameters, wherein the infrastructure facilitates the delivery of multiple content types to different devices using different protocols; and

an external parameter setting mechanism for inputting respective service defining parameters to said generic definition, thereby to implement a desired service through said generic definition, said generic definition includes consideration of resource constraints of the different devices.

37. (Previously Presented) The apparatus of claim 36, wherein said generic definition comprises an ability to select between one of a plurality of levels of complexity of content presentation according to a determined capability level of a receiving telephone.

38. (Previously Presented) The apparatus of claim 36, carrying a plurality of services each defined using said generic service and different service defining parameters.

39. (Previously Presented) The apparatus of claim 36, configured to allow a plurality of services to be defined using different service-defining parameters applied to said generic service.

40. (Previously Presented) The apparatus of claim 36, further comprising a rule engine together with said generic definition, for operating logic required for said desired service by implementing ones of said service defining parameters that are logical rules.

41. (Previously Presented) The apparatus of claim 36, further comprising an external

parameter obtaining mechanism to obtain external parameters for modifying application of a respective desired service to a user.

42. (Previously Presented) The apparatus of claim 41, wherein said external parameter is location of a respective mobile telephone, and wherein said modifying comprises modifying said application in accordance with a respective location.

43. (Previously Presented) The apparatus of claim 36, comprising a plurality of modules, each module carrying said generic definition together with a different arrangement of parameters, thereby to combine different services within said platform.

44. (Previously Presented) The apparatus of claim 43, being able to support additional services by the incorporation of additional modules.

45. (Previously Presented) A method for the provision of services over a cellular telephone network comprising:

providing a generic definition of a cellular service, said generic definition incorporating common features of different services, and said generic definition being able to take specific service-defining parameters wherein the cellular telephone network facilitates the delivery of multiple content types to different devices using different protocols, and

for each one of a plurality of desired services, inputting respective service defining parameters to said generic definition, thereby to implement a desired service through said generic definition wherein said generic definition includes consideration of resource constraints of the different devices.

46. (Previously Presented) The method of claim 45, wherein said generic definition comprises an ability to select between one of a plurality of levels of complexity of content presentation according to a determined capacity level of a receiving telephone.

47. (Previously Presented) The method of claim 45, comprising defining a plurality of

services each using said generic service and different service defining parameters, and providing each service as a separate module sharing a common interface.

48. (Previously Presented) The method of claim 45, further comprising operating logic required for a respective desired service by implementing ones of said service defining parameters that are logical rules.

49. (Previously Presented) The method of claim 45, further comprising obtaining external parameters for modifying application of a respective desired service to a user.

50. (Previously Presented) The method of claim 49, wherein said external parameter is location of a respective mobile telephone, and wherein said modifying comprises modifying said application in accordance with a respective location.

51. (Previously Presented) A method for managing a content delivery interface between a content provider and a subscriber wireless communication device, the method comprising:

providing a plurality of modules for the content delivery interface, each module for providing content as part of a different service wherein delivery of multiple content types to different devices using different protocols is faciliated;

providing a generic definition of said service, said generic definition incorporating common features of different services; selecting an appropriate one of said modules for the content delivery interface according to a currently desired service and said generic definition wherein said generic definition includes consideration of resource constraints of the different devices; and

adding said appropriate module to the content delivery interface, thereby to provide said currently desired service from a platform that supports a plurality of services.

52. (Previously Presented) The method of claim 51, wherein said adding said appropriate one of said modules comprises providing a functional alteration for the

content delivery interface for interacting with the wireless communication device, according to said currently desired service.

53. (Previously Presented) The method of claim 52, wherein said functional alteration comprises a change to a flow of interaction between the content delivery interface and the wireless communication device.

54. (Previously Presented) The method of claim 52, wherein said functional alteration comprises a change to the look and feel of the content delivery interface at the wireless communication device.

55. (Previously Presented) The method of claim 53, wherein said functional alteration comprises:

adding a new content type;

adding a new content delivery protocol; Adding a new device and adjusting the user interface to its browser and its display characteristics;

adding a new page;

adding content bundles that include multiple content items;

changing the look and feel of the service, including at least one of colors, fonts, icons, formatting and page layout; and

changing parameters of the service.

56. (Previously Presented) The method of claim 52, wherein said functional alteration comprises a change in a respective service according to an identity of a subscriber, a service package of said subscriber, a preference of said subscriber and a type of wireless communication device.

57. (Previously Presented) The method of claim 56, wherein said change comprises dynamic adaptation of the service, optionally including at least one of:

matching the output format and presentation to the device type;

filtering of content, based on at least one of permissions, compatibility to the device, subscriber preferences, and content classification;

selection of a language;

dynamic flow; and

adjustment of delivery protocol based on the content type and the device.

58. (Previously Presented) The method of claim 52, comprising providing each module with a generic service definition and customizing ones of said modules for services it is desired to provide.

59. (Previously Presented) The method of claim 58, wherein the content delivery interface further comprises a service directory for locating a service, such that said adding said appropriate module further comprises altering a listing in said service directory as necessary when a service is added, removed or altered.

60. (Previously Presented) The method of claim 58, wherein the content delivery interface further defines a presentation for providing an output of said service to the wireless communication device, such that said functional alteration comprises altering said presentation as necessary when a service is added, removed or altered.

61 (Previously Presented) The method of claim 58, wherein said functional alteration comprises altering a logic of said service.

62. (Previously Presented) A service delivery platform for an interface between a content provider and a wireless communication device, comprising:

a plurality of services for being provided to the wireless communication device by the content provider;

an infrastructure for supporting a generic definition of a cellular service, said generic definition incorporating common features of different services;

a service controller for receiving a request for a service from the wireless communication device and for activating said service according to a service logic and

said generic definition, wherein said service logic comprises at least one rule for determining at least one of whether and how said service is to be provided; and

a service framework, configured to enable ones of said services to be added, removed or changed.

63. (Previously Presented) The delivery platform of claim 62, further comprising a service directory for listing ones of said services, and wherein said service controller is configured to search said service directory for said service upon receiving said request.

64. (Previously Presented) The delivery platform of claim 62, wherein said service comprises a plurality of operations to be performed, and a response to be returned to the wireless communication device.

65. (Previously Presented) The delivery platform of claim 64, further comprising a presentation for presenting said response of said service.

66. (Previously Presented) The delivery platform of claim 65, wherein said presentation comprises a presentation assembler for collecting data and preparing said data for said response to the wireless communication device.

67. (Previously Presented) The delivery platform of claim 62, wherein an operation of said service is performed according to at least one rule.

68. (Previously Presented) The delivery platform of claim 67, further comprising a rule operation for constructing the condition for said rule.

EVIDENCE APPENDIX

None.

RELATED PROCEEDINGS APPENDIX

None.